

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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SCANSOFT, INC.,	)
	)
Plaintiff,	)
	)
v.	) C.A. No. 04-10353-PBS
	)
	)
VOICE SIGNAL TECHNOLOGIES, INC.,	)
LAURENCE S. GILLICK, ROBERT S.	)
ROTH, JONATHAN P. YAMRON, and	)
MANFRED G. GRABHERR,	)
	)
Defendants.	)
	)

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**DECLARATION OF WENDY S. PLOTKIN**

Wendy S. Plotkin deposes and states as follows:

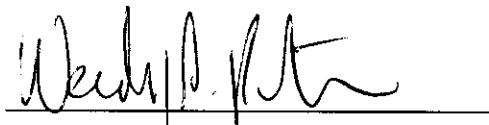
1. I am an attorney in the law firm of Choate, Hall & Stewart, and a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts. I am counsel to the above-named defendants and make this declaration in support of the defendants Memorandum in Support of Its Objections to the Magistrate Judge's Order Regarding Trade Secrets.
2. Attached hereto as Ex. A is a true and correct copy of the Order on Defendant's Motion for Protective Order Compelling Identification of Trade Secrets.
3. Attached hereto as Ex. B is a true and correct copy of the transcript of the March 16, 2005 hearing before this Court.

4. Attached hereto as Ex. C is a true and correct copy of documents Bates labeled SS016318, SS016319, SS016320, SS016321, SS016322, SS016323, SS016352, SS016353, SS016355, SS016356, SS016357, SS016358, SS016365, SS016366.

5. Attached hereto as Ex. D is a true and correct copy of the ScanSoft, Inc.'s Answers to the Second Set of Interrogatories (Nos. 1-4) of Voice Signal Technologies, Inc.

\* \* \*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Wendy D. M. Hart", is written over a horizontal line.

Dated: April 13, 2005